

AUSA: Jorja N. Knauer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

BOBBY WELLS,

Defendant.

COMPLAINT

25mj866

Violations of 18 U.S.C. §§ 1951 &
924(c)

COUNTY OF OFFENSE:
WESTCHESTER

SOUTHERN DISTRICT OF NEW YORK, ss.:

RYAN ZIMMERMAN, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(Hobbs Act Robbery)

1. On or about March 12, 2025, in the Southern District of New York and elsewhere, BOBBY WELLS, the defendant, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WELLS robbed at gunpoint a T-Mobile store located in the vicinity of 734 McLean Avenue in Yonkers, New York.

(Title 18, United States Code, Section 1951.)

COUNT TWO
(Firearms Use, Carrying, and Possession)

2. On or about March 12, 2025, in the Southern District of New York and elsewhere, BOBBY WELLS, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count One of this Complaint, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, which was brandished.

(Title 18, United States Code, Section 924(c)(1)(A)(i) and (ii).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

3. I am a Special Agent with FBI. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with law enforcement officers, witnesses, and others, my examination of documents, videos, reports and records, and my involvement in this investigation. Because this affidavit is being submitted for the limited purpose

of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The T-Mobile Robbery

4. Based on my conversations with other law enforcement officers, my review of law enforcement reports and records, and my review of surveillance videos related to a robbery that occurred on or about March 12, 2025 (the “T-Mobile Robbery”), I have learned the following, in substance and in part:

a. On or about March 12, 2025, at approximately 11:35 a.m., a man, later identified as BOBBY WELLS, the defendant, walked into a T-Mobile store located in the vicinity of 734 McLean Avenue in Yonkers, New York (the “T-Mobile”).

b. WELLS wore a dark-colored winter jacket with fur-trimmed hood, blue jeans, tan-colored work boots, and a black face covering over the lower portion of his face, leaving a tattoo visible near WELLS’s left eye.

c. After entering the T-Mobile, WELLS approached the individual working behind the cash register (the “Clerk”), pointed what appeared to be a firearm at the Clerk, and demanded that the Clerk provide money from the cash register.

d. In response to WELLS’s demand, the Clerk placed approximately \$150 in cash on the counter. WELLS grabbed the cash and left the T-Mobile.

Identification of BOBBY WELLS

5. Based on my conversations with other law enforcement officers and my review of law enforcement reports and records, I am aware of the following:

a. Based on a review of surveillance camera footage, detectives with the Yonkers Police Department (“YPD”) determined that on or about March 12, 2025, at approximately 11:40 a.m., BOBBY WELLS, the defendant, exited the T-Mobile and then entered a Honda minivan bearing New York license plate LHC4627 (the “Minivan”). Based on a review of department of motor vehicle records, YPD detectives determined that the license plate attached to the Minivan was, in fact, registered to another vehicle.

b. On or about March 12, 2025, at approximately 1:20 p.m., following a review of license plate reader data, law enforcement observed the Minivan near the intersection of Ashburton Avenue and Yonkers Avenue in Yonkers, New York. WELLS was observed in the driver’s seat, and a woman was observed in the passenger’s seat.

c. At approximately 1:25 p.m., officers with the YPD attempted to conduct a vehicle stop. In response to this attempt, WELLS sped off in the Minivan, driving on the sidewalk while fleeing. At a certain point, the Minivan turned onto a dead-end street. Officers with the YPD who pursued the Minivan then observed WELLS throw what appeared to be a firearm out of

the driver's side window. The Minivan then stopped. When YPD officers approached the Minivan, WELLS refused to exit the vehicle and was arrested by YPD officers after a struggle. Thereafter, YPD officers recovered the firearm that WELLS tossed from the Minivan.

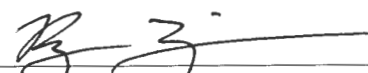
6. Based on my conversations with other law enforcement officers, I know that during the arrest of BOBBY WELLS, the defendant, by YPD officers, a dark-colored winter jacket was found in the Minivan. Based on my review of law enforcement reports and records, my review of surveillance footage, and my review of physical evidence, I believe that the dark-colored winter jacket that was found in the Minivan is the same jacket that WELLS wore during the T-Mobile Robbery.

7. Based on my review of law enforcement reports and records and my participation in this investigation, I believe that BOBBY WELLS, the defendant, matches eyewitnesses' description of the man who committed the T-Mobile Robbery.

8. Based on my review of law enforcement reports and records, I know that the firearm that WELLS tossed from the Minivan was a loaded Sentinel MK IV, .22-caliber revolver with serial number S4805 (the "Revolver"). Based on my review of surveillance footage and law enforcement reports and records, I believe that the Revolver is the same firearm that was brandished during the T-Mobile Robbery.

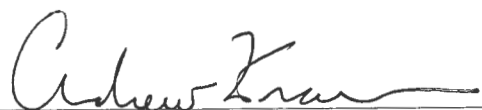
9. Based on my conversations with other law enforcement officers, my review of law enforcement reports and records, my review of surveillance camera footage from T-Mobile, and my participation in this investigation, I believe that BOBBY WELLS, the defendant, is the same man who committed the T-Mobile Robbery.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of BOBBY WELLS, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



RYAN ZIMMERMAN
Special Agent
Federal Bureau of Investigation

Sworn to before me this 13th day of March, 2025.



THE HONORABLE ANDREW E. KRAUSE
United States Magistrate Judge
Southern District of New York